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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
9311 GROH ROAD, ROOM 216
GROSSE ILE, MI 48138-1697

REPLY TO ATTENTION OF:

April 7, 2005

Dear Mr. Kurzanski:

As I have discussed with CSXT over the past several months, U.S. EPA is preparing to conduct a cleanup of asbestos contamination at the former W.R. Grace facility in Dearborn, Michigan. It also appears that facility operations and transportation has contaminated adjacent property owned by CSXT. The report "Former W.R. Grace Asbestos Investigation, N-Forcer Site; CSXT No. R008210, CSX Transportation, Inc, Dearborn Michigan" commissioned by CSXT showed analytical results for asbestos consistent with the characteristics of Libby Amphiboles. Libby vermiculite is known to contain both asbestos fibers and related fibrous asbestiform minerals. U.S. EPA, MDCH, and ATSDR believe the fibrous asbestiform minerals, with or without additional asbestos, is a health threat.

An air dispersion model shows the predominant northeasterly winds caused CSXT's property to have been heavily impacted by W.R. Grace's operation (see attached). Consistent with U.S. EPA's notice letter, U.S. EPA is beginning cleanup activities on the former W.R. Grace facility and believes that prompt cleanup on the CSXT property is also necessary to fully address the existing health threats and to prevent recontamination of the areas that U.S. EPA is cleaning up.

As I said in my voice mail, I would like to know if and when CSXT plans further action on its property.

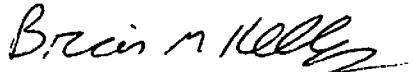
It is particularly important that those activities be coordinated with U.S. EPA's efforts. CSXT should therefore notify U.S. EPA of the actions CSXT will take to prevent asbestos and fibrous asbestiform from leaving CSXT property. U.S. EPA recognizes that the presence of the rail line on CSXT's property presents particular challenges and constraints for response activities to address the asbestos contamination. For that reason, U.S. EPA believes that CSXT is particularly well-suited to develop and implement appropriate response plans, in coordination with U.S. EPA.

Since its August 29, 2003, response, CSXT representatives have visited the facility and seen the side tracks entering the facility and the switch off CSXT's line, and been provided a map with photos showing the historical use of the tracks. Attached are photos showing tremolite bundles on CSXT property. In addition U.S. EPA's sampling data at the former W.R. Grace facility shows tremolite asbestos contamination extending to CSXT's property boundary. In light of this information, U.S. EPA does not believe that CSXT can credibly deny a possible connection to

the presence of asbestos contamination on its property and on the Site. As a result, CSXT should consider giving immediate priority to cleaning up asbestos on its property. If CSXT is unwilling to do so, I request that you inform me by close of business on April 13, 2005, so that U.S. EPA may pursue other enforcement options.

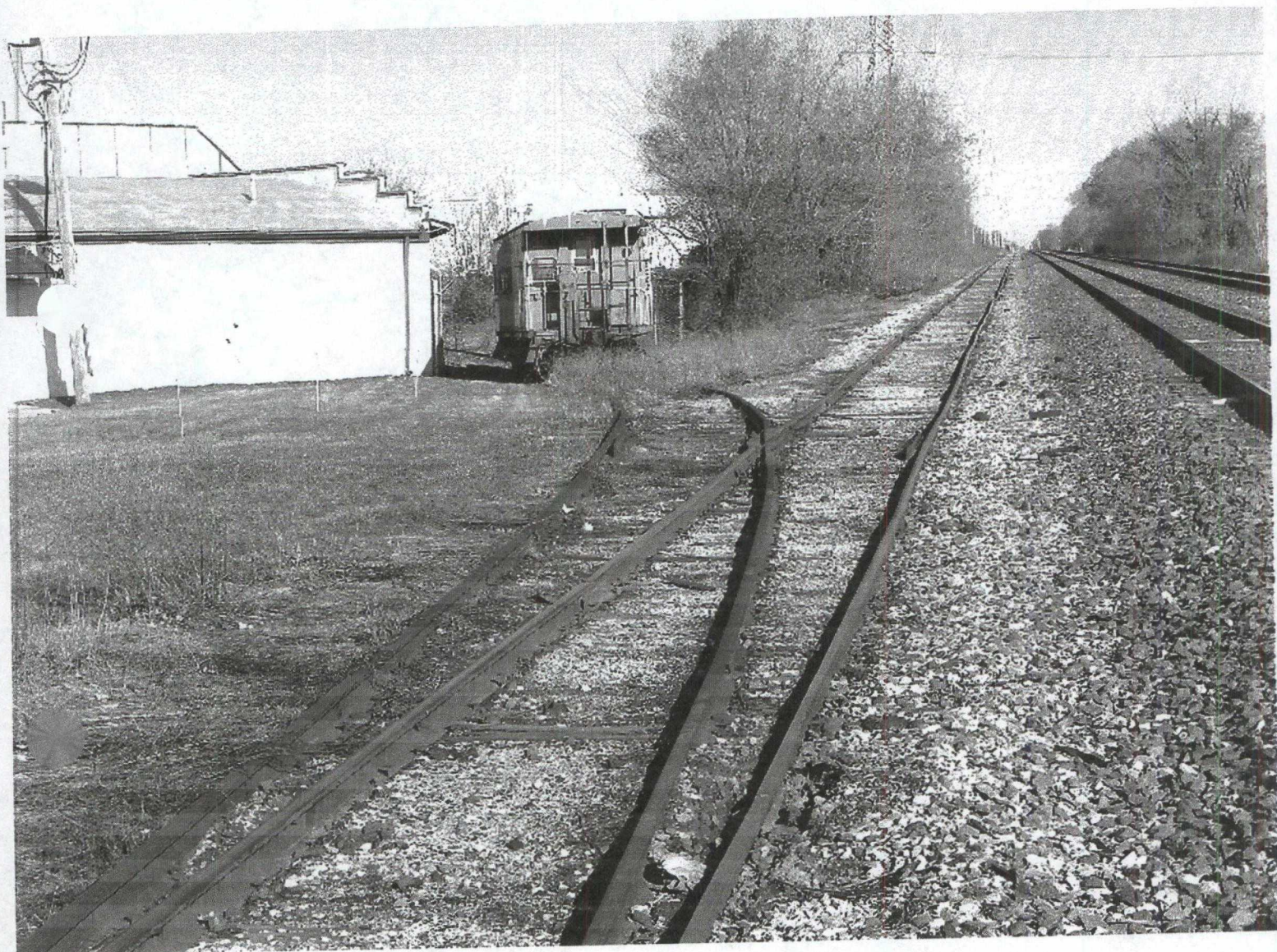
Please call me at your earliest possible convenience to discuss this further.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brian M. Kelly", with a long horizontal flourish extending to the right.

Brian M. Kelly
On-Scene Coordinator
(734) 692-7684

cc: Jason El-Zein, U.S. EPA
Thomas Krueger, U.S. EPA
Peggy Rounds, CSXT







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facsimile transmittal

To: Paul Kruzanski, CSXT

Fax: 904-245-2857

Peggy Round, CSXT

From: Brian Kelly, U.S. EPA

Date: 4/7/2005

Re:

Pages: 6 including cover

CC:

☒ Urgent

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